

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF  
MATTHEW EVANS OF ALIXPARTNERS, LLP**

Pursuant to 28 U.S.C. § 1746, I, Matthew Evans, state under penalty of perjury, that:

1. I am a Partner and Managing Director of AlixPartners, LLP (“AlixPartners”), which has a place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

3. I submit this supplemental declaration in the cases of the above-captioned debtors (collectively, the “Debtors”) to supplement the disclosures set forth in my original declaration dated December 21, 2022 [ECF No. 277] (the “Original Declaration”).

4. Unless otherwise noted, references to AP<sup>2</sup> below collectively refer to AlixPartners, AP Holdings and each of their respective subsidiaries. AlixPartners would like to disclose the following:

- AP did not receive any payments from the Debtors within the 90 days prior to the Petition Date.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used herein shall have meanings ascribed to them in the Original Declaration.

- Debtors' counsel has advised that John Ray selected AlixPartners based on the interviews conducted of AlixPartners and one other firm considered for the scope of its engagement in these chapter 11 cases. Debtors' counsel has advised that it identified the need for a forensic analytical firm and suggested AlixPartners and one other firm to Mr. Ray, and that its recommendations were based on the nature of the work required, and prior experiences with AlixPartners and the other firm. As set forth in the Original Declaration, AlixPartners has a unique skill set combining financial advisory expertise with extensive exchange trading capabilities (including the ability to review trades, analyze big data, connect orders to trades, connect the people to the trading strategies and tie together the asset tracing components), as well as its governmental/regulatory backgrounds. AlixPartners is uniquely experienced to conduct and perform this investigative work.
- The services that AP is providing are investigative and factually based. With innumerable transactions between FTX and third parties, there are certainly some between FTX entities and Alameda entities. To the extent there is a clear degree of separation between FTX and Alameda related matters, AP will note Alameda in the relevant time entries.
- AP will charge its 2023 rates as of January 1, 2023.
- The connections disclosed in Schedule 2 attached to my Original Declaration are unrelated to the Debtors and these chapter 11 bankruptcy cases.
- AP does not have any direct connections to any of the following individuals: Samuel Bankman-Fried, Nishad Singh, Gary Wang, Caroline Ellison, Ryan Salame, Ryne Miller, Barbara Fried, Joseph Bankman. Ryne Miller is a former employee of Sullivan & Cromwell. AP has worked with Sullivan & Cromwell in several former matters.
- As set forth in the Original Declaration, AP follows a practice to solicit from its Institutional Investors their connections to the Investor Search Parties. In response, the Institutional Investors have offered the following disclosures of their respective connections to the Investor Search Parties:
  - Investcorp — no investments in the Investor Search Parties.
  - CDPQ — equity investment in (1) Akbank TAS; (2) Bank of America Corp.; (3) Eurobank Ergasias Services and Holdings SA; (4) Far Eastern International Bank; (5) HDFC Bank Ltd.; (6) HSBC Holdings PLC; (7) Interactive Brokers Group Inc.; (8) Morgan Stanley; (9) National Australia Bank Ltd.; (10) Nuvei Corp.; (11) Signature Bank/New York NY; and (12) Wells Fargo & Co., in each case representing less than one percent (1%) of total assets under management. CDPQ has debt investment in (1) Bank of America Corp.; (2) HSBC Bank Canada; (3) HSBC Bank Building; (4) HSBC Holdings PLC; (5) Morgan Stanley; (6) National Australia Bank Ltd.; and (7) Wells Fargo & Co. CDPQ does not have investments in any other Investor Search Parties.
  - PSP — investment in (1) JPMorgan; (2) Morgan Stanley; (3) Wells Fargo; (4) Nuvei; (5) HSBC Bank; (6) National Australia Bank; (7) Akbank TAS; (8) Emirates NBD Bank PJSC; (9) HDFC Bank Ltd.; (10) Signature Bank; and (11) Stripe, in each case

representing less than one percent (1%) of total assets under management. PSP does not have investments in any other Investor Search Parties.

- Binance and Binance Capital Management Co. Ltd. are significant competitors and contract counterparties to the Debtors. Binance is a company associated with Mr. Chen Weixing, an AP client in a former engagement wherein AP provided eDiscovery services unrelated to the Debtors or these chapter 11 bankruptcy cases. Binance Holdings Limited is listed as an adverse defendant to AP's client Mr. Chen Weixing in a current engagement wherein AP provides eDiscovery services unrelated to the Debtors or these chapter 11 cases.
- Celsius Network LLC is a creditor to the Debtors. AP is an unsecured creditor to Celsius and has filed a general unsecured claim in the amount of \$4,930,753.00 in the Celsius bankruptcy matter. AP last performed services for Celsius on or about July 2022. AP did not provide any post-petition services to Celsius.
- Eat.Learn.Play., a donation party to the Debtors, is a vendor to AP.
- Evolve Bank and Trust, a bank/lender/UCC lien party to the Debtors, is the distributing bank for claims related to the PG&E bankruptcy, a bankruptcy matter unrelated to the Debtors. AP works with Evolve Bank and Trust with respect to AP's claims/distribution work on the PG&E matter.
- FTI Consulting, Inc. is a contract counterparty to the Debtors. FTI Consulting (Singapore) Pte. Ltd. is a current AP client in matters unrelated to the Debtors.
- FTX, and affiliates, are Debtors in this bankruptcy matter. Two AP employees who are not working on this bankruptcy matter are de minimis creditors of FTX as a result of minor investments into FTX trading accounts prior to the time that FTX was an AP client.
- Kroll Restructuring Administration is a professional in this bankruptcy matter. Jordan Searles, the brother of Adam Searles, an AP Director who is working on this matter, is a Director at Kroll. Confidentiality and professional obligations require Adam Searles and Jordan Searles to refrain from discussing any non-public information related to these chapter 11 cases. In addition, AP's current CEO, Simon Freakley, was the CEO of Kroll Associates, Inc. from 2004-2008, and began his tenure at AP in 2015.
- Morgan Lewis, a vendor to the Debtors, is a professional, counsel, and opposing counsel to current and former AP client in matters unrelated to the Debtors. Morgan Lewis is a current and former AP client in matters unrelated to the Debtors.
- MUFG Bank, Ltd., a bank/lender/UCC lien party/administrative agent to the Debtors, is a GSS investor.

- Prager Metis CPAs LLC is an ordinary course professional to the Debtors. The partner of a current AP Partner and Managing Director's brother is the Global Managing Partner at Prager Metis CPAs, LLC. The AP Partner and Managing Director is not working on this bankruptcy matter.
- PricewaterhouseCoopers LLP ("PwC") is a vendor to the Debtors. Jay Alix, an AP board member and the founder of AlixPartners, and Art Kubert, the CFO of Jay Alix's affiliate Lakeview Capital, are former employees of PwC. Both Mr. Alix's and Mr. Kubert's tenures at PwC ended over 30 years ago.
- Securities and Exchange Commission ("SEC"), a taxing authority/governmental/regulatory agency to the Debtors, is a litigation party, adverse litigation party, and related party to current and former AP clients in matters unrelated to the Debtors. SEC is a former employer of current AP employees. SEC is a current and former AP client in matters unrelated to the Debtors.

5. AlixPartners does not believe that the supplemental disclosures above impact its disinterestedness. I continue to reserve the right to supplement AlixPartners' disclosures in the event that AlixPartners learns of any additional connections that require disclosure. If any new material relevant facts or relationships are discovered or arise, AlixPartners will promptly file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Dated: January 17, 2023  
New York, New York

AlixPartners, LLP

/s/ **Matthew Evans**

Matthew Evans  
Partner and Managing Director